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Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of Oregon

PORTLAND Division

KARIN MARROQUIN, SERGIO GARCIA

Case No.

3:23-cv-1915-YY
(to be filled in by the Clerk's Office)*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

PORTLAND GENERAL ELECTRIC, CFO/ JOSEPH
TRPIK, DAVID F. WHITE all inclusive*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	KARIN MARROQUIN, SERGIO GARCIA
Street Address	PO.BOX 33981
City and County	PORTLAND MULTNOMAH
State and Zip Code	OREGON 97292
Telephone Number	971-290-8345
E-mail Address	kmarroquin291@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	PORTLAND GENERAL ELECTRIC, JOSEPH TRPIK
Job or Title (if known)	CFO
Street Address	121 SW SALMON STREET
City and County	PORTLAND MULTNOMAH
State and Zip Code	OREGON 97204
Telephone Number	503-228-6322
E-mail Address (if known)	pgecommunications@pgn.com

Defendant No. 2

Name	DAVID F. WHITE
Job or Title (if known)	Managing Assistant General Counsel
Street Address	121 SW SALMON STREET
City and County	PORTLAND MULTNOMAH
State and Zip Code	OREGON 97204
Telephone Number	503-464-7822
E-mail Address (if known)	portlandgeneral.com

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Federal Reserve Act Section 16, 29, Bill of Exchange Act, Bill of Rights, Truth in Lending, Uniform Commercial Code.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

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b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

PLEASE SEE ATTACHED ADDITIONAL PAGES

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

PLEASE SEE ATTACHED ADDITIONAL PAGES

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12-18-2023

Signature of Plaintiff Without Recourse
 Printed Name of Plaintiff By: Marroquin, Karin / Authorized Representative
KARIN MARROQUIN

B. For Attorneys

Date of signing: _____

Signature of Attorney _____
 Printed Name of Attorney _____
 Bar Number _____
 Name of Law Firm _____
 Street Address _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____

RELIEF

A demand of the relief which the party claims. The Degree of Culpability of the Wrongdoer(s) offends the Plaintiff(s) \$15.000

A demand for the relief which money is demanded. The character of the conduct involved continues \$15.000

A demand for the relief of violations of the Rights Under Color of Law TITLE 18, U.S.C. Exemplary damages to punish and deter wrongdoer(s) \$15.000

A demand for the relief of the willful deprivation of rights or privileges protected by the Constitution or laws of the United States. The Situation of the Defendants continues, to the extend of to which the malicious conduct entitle the Plaintiff(s) to assert and govern the Complaint \$15.000.

STATEMENT OF CLAIM

- 1. Breach of Contract, (September 17th 2023, October 18th 2023, Defendant acknowledged Contract, Breached the Contract)**
- 2. Breach of Fiduciary Duties, (September 17th 2023, October 18th 2023, Defendant(s) Breached Fiduciary Duties By non Performance)**
- 3. Violation of Bill of Exchange Act, (September 7th 2023, Defendant(s) violated Bill of Exchange act Obligations In Good Faith, Negotiable Instruments, Enforcement of Instruments)**
- 4. Violation of Federal Reserve Act Section 16, 29. (September 7th 2023, Defendant(s) Breached the Provisions under Federal Reserve Act)**
- 5. Truth in Lending. (September 24th, 2023, Defendant(s) Breached of Rights under Color of Law TITLE 18, U.S.C., SECTION 242)**